Joseph G. Went, Esq.
Nevada Bar No. 9220
Nicole E. Lovelock, Esq.
Nevada Bar No. 11187
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
(702) 669-4600
(702) 669-4650 – fax
jgwent@hollandhart.com
nelovelock@hollandhart.com

Attorneys for Defendant
Mutual of Omaha Bank

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARGARET M. OKAMOTO,

Plaintiff,

v.

BANK OF AMERICA, NATIONAL ASSOCIATION; YOUR CREDIT INC. D/B/A FAMILY FINANCE; MUTUAL OF OMAHA BANK; GENTRY FINANCE CORP OF NEVADA D/B/A SAHARA FINANCE; YOUR CREDIT INC. D/B/A STANDARD LOAN; GENTRY FINANCIAL INC. D/B/A STAR LOANS; RBS COMPUTER INC. D/B/A ROYAL MANAGEMENT CORPORATION; AND EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendants.

CASE NO. 2:15-cv-01800-GMN-GWF

DEFENDANT MUTUAL OF OMAHA BANK'S ANSWER TO PLAINTIFF MARGARET M. OKAMOTO'S COMPLAINT AND JURY DEMAND

Defendant Mutual of Omaha Bank ("MOB" or "Defendant"), by and through its counsel of record of the law firm of Holland & Hart, LLP, hereby answers Plaintiff Margaret M. Okamoto's ("Okamoto" or "Plaintiff") complaint on file herein as Docket 1 (the "Complaint") as follows:

INTRODUCTION

1. In response to Paragraph 1 of the Complaint, MOB answers and states that the allegations set forth therein contain sections of the text of the Fair Credit Reporting Act (the

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

"FCRA"), and that the FCRA speaks for itself and, on that basis, denies any and all allegations of Paragraph 1.

2. In response to Paragraph 2 of the Complaint, MOB admits that Okamoto "brings this action to challenge the actions of" the Defendants named in the Complaint. Except as specifically admitted, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

3. In response to Paragraph 3 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

4. In response to Paragraph 4 of the Complaint, MOB answers and states that the Complaint speaks for itself, and, on that basis, denies any and all allegations of Paragraph 4.

5. In response to Paragraph 5 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

6. In response to Paragraph 6 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

7. In response to Paragraph 7 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

JURISDICTION AND VENUE

8. In response to Paragraph 8 of the Complaint, MOB answers and states that the allegations set forth therein are legal conclusions that are not subject to denial or admission, and therefore, MOB denies each and every allegation therein.

9. In response to Paragraph 9 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

10. In response to Paragraph 10 of the Complaint, MOB admits that it is "subject to personal jurisdiction in the County of Clark, State of Nevada." With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

PARTIES

11. In response to Paragraph 11 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

12. In response to Paragraph 12 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

13. In response to Paragraph 13 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

14. In response to Paragraph 14 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

15. In response to Paragraph 15 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

16. In response to Paragraph 16 of the Complaint, MOB denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

17. In response to Paragraph 17 of the Complaint, MOB answers and states that the allegations set forth therein are legal conclusions that are not subject to denial or admission, and therefore, MOB denies each and every allegation therein.

18. In response to Paragraph 18 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

19. In response to Paragraph 19 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

20. In response to Paragraph 20 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

21. In response to Paragraph 21 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

22. In response to Paragraph 22 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

23. In response to Paragraph 23 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

24. In response to Paragraph 24 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

25. In response to Paragraph 25 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

26. In response to Paragraph 26 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

27. In response to Paragraph 27 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

28. In response to Paragraph 28 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

GENERAL ALLEGATIONS

29. In response to Paragraph 29 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

30. In response to Paragraph 30 of the Complaint, MOB admits that it "conducted business in the State of Nevada." With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

31. In response to Paragraph 31 of the Complaint, MOB admits the allegations set forth therein.

32. In response to Paragraph 32 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

33. In response to Paragraph 33 of the Complaint, MOB admits the allegations set forth therein.

34. In response to Paragraph 34 of the Complaint, MOB admits that it did not "file any proceedings to declare [its] alleged debts 'non-dischargeable' pursuant to 11 U.S.C. § 523 *et seq.*" in Plaintiff's bankruptcy case. With respect to the remaining allegations set forth in this paragraph,

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

35. In response to Paragraph 35 of the Complaint, MOB admits that it did not obtain "relief from the 'automatic stay' codified at 11 U.S.C. § 362 *et seq*. while Plaintiff's Bankruptcy was pending to pursue the Plaintiff for any *personal* liability." With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

36. In response to Paragraph 36 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

37. In response to Paragraph 37 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

38. In response to Paragraph 38 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

39. In response to Paragraph 39 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

40. In response to Paragraph 40 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

41. In response to Paragraph 41 of the Complaint, MOB admits that the "Consumer Data Industry Association ("CDIA") publishes standard guidelines for reporting data called the 'Metro 2 Format.'" With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

42. In response to Paragraph 42 of the Complaint, MOB answers and states that the allegations set forth therein contain sections of the text of the CDIA, and that the CDIA speaks for itself and, on that basis, denies any and all allegations of Paragraph 42.

43. In response to Paragraph 43 of the Complaint, MOB answers and states that the allegations set forth therein contain sections of the text of the CDIA, and that the CDIA speaks for itself and, on that basis, denies any and all allegations of Paragraph 43.

44. In response to Paragraph 44 of the Complaint, MOB answers and states that the allegations set forth therein are legal conclusions that are not subject to denial or admission, and therefore, MOB denies each and every allegation therein.

45. In response to Paragraph 45 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

BOA Misreported Credit Information
RE: Account No. xxxxxxxx9947

46. In response to Paragraph 46 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

47. In response to Paragraph 47 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

48. In response to Paragraph 48 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

49. In response to Paragraph 49 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

50. In response to Paragraph 50 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

51. In response to Paragraph 51 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

52. In response to Paragraph 52 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

53. In response to Paragraph 53 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

54. In response to Paragraph 54 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

55. In response to Paragraph 55 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

56. In response to Paragraph 56 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

57. In response to Paragraph 57 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

58. In response to Paragraph 58 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

59. In response to Paragraph 59 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

60. In response to Paragraph 60 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

61. In response to Paragraph 61 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

62. In response to Paragraph 62 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

63. In response to Paragraph 63 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

64. In response to Paragraph 64 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

/ / /

/ / /

/ / /

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

FAMILY/RBS Misreported Credit Information

RE: Account No. Y04X*

65. In response to Paragraph 65 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

66. In response to Paragraph 66 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

67. In response to Paragraph 67 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

68. In response to Paragraph 68 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

69. In response to Paragraph 69 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

70. In response to Paragraph 70 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

71. In response to Paragraph 71 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

72. In response to Paragraph 72 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

/ / /

/ / /

73. In response to Paragraph 73 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

74. In response to Paragraph 74 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

75. In response to Paragraph 75 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

76. In response to Paragraph 76 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

77. In response to Paragraph 77 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

78. In response to Paragraph 78 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

79. In response to Paragraph 79 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

80. In response to Paragraph 80 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

81. In response to Paragraph 81 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

82. In response to Paragraph 82 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

83. In response to Paragraph 83 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

MOB Misreported Credit Information

RE: Account No. 3101*

84. In response to Paragraph 84 of the Complaint, MOB denies each and every allegation set forth therein.

85. In response to Paragraph 85 of the Complaint, MOB admits that Plaintiff filed bankruptcy on October 31, 2013. MOB denies each and every other allegation set forth in this paragraph.

86. In response to Paragraph 86 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

87. In response to Paragraph 87 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

88. In response to Paragraph 88 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

89. In response to Paragraph 89 of the Complaint, MOB denies each and every allegation set forth therein.

90. In response to Paragraph 90 of the Complaint, MOB answers and states that the allegations set forth therein are legal conclusions that are not subject to denial or admission, and therefore, MOB denies each and every allegation therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

91. In response to Paragraph 91 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

92. In response to Paragraph 92 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

93. In response to Paragraph 93 of the Complaint, MOB denies each and every allegation set forth therein.

94. In response to Paragraph 94 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

95. In response to Paragraph 95 of the Complaint, MOB denies each and every allegation set forth therein.

96. In response to Paragraph 96 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

97. In response to Paragraph 97 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

98. In response to Paragraph 98 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

99. In response to Paragraph 99 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

100. In response to Paragraph 100 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

101. In response to Paragraph 101 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

102. In response to Paragraph 102 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

SAHARA/RBS Misreported Credit Information

RE: Account No. 615X*

103. In response to Paragraph 103 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

104. In response to Paragraph 104 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

105. In response to Paragraph 105 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

106. In response to Paragraph 106 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

107. In response to Paragraph 107 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

108. In response to Paragraph 108 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

109. In response to Paragraph 109 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

110. In response to Paragraph 110 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

111. In response to Paragraph 111 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

112. In response to Paragraph 112 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

113. In response to Paragraph 113 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

114. In response to Paragraph 114 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

115. In response to Paragraph 115 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

116. In response to Paragraph 116 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

117. In response to Paragraph 117 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

118. In response to Paragraph 118 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

119. In response to Paragraph 119 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

120. In response to Paragraph 120 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

121. In response to Paragraph 121 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

STANDARD/RBS Misreported Credit Information

RE: Account No. 803X1*

122. In response to Paragraph 122 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

123. In response to Paragraph 123 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

124. In response to Paragraph 124 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

125. In response to Paragraph 125 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

126. In response to Paragraph 126 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

127. In response to Paragraph 127 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

128. In response to Paragraph 128 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

129. In response to Paragraph 129 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

130. In response to Paragraph 130 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

131. In response to Paragraph 131 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

132. In response to Paragraph 132 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

133. In response to Paragraph 133 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

134. In response to Paragraph 134 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

135. In response to Paragraph 135 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

136. In response to Paragraph 136 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

137. In response to Paragraph 137 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

138. In response to Paragraph 138 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

139. In response to Paragraph 139 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

140. In response to Paragraph 140 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

/ / /

/ / /

/ / /

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

STAR/RBS Misreported Credit Information

RE: Account No. 2X*

141. In response to Paragraph 141 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

142. In response to Paragraph 142 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

143. In response to Paragraph 143 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

144. In response to Paragraph 144 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

145. In response to Paragraph 145 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

146. In response to Paragraph 146 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

147. In response to Paragraph 147 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

148. In response to Paragraph 148 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

/ / /

/ / /

149. In response to Paragraph 149 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

150. In response to Paragraph 150 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

151. In response to Paragraph 151 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

152. In response to Paragraph 152 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

153. In response to Paragraph 153 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

154. In response to Paragraph 154 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

155. In response to Paragraph 155 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

156. In response to Paragraph 156 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

157. In response to Paragraph 157 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

158. In response to Paragraph 158 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

159. In response to Paragraph 159 of the Complaint, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies each and every allegation set forth therein.

FIRST CAUSE OF ACTION
VIOLATION OF THE FAIR CREDIT REPORTING ACT
15 U.S.C.§ 1681 *Et. Seq.* (FCRA)_

160. In response to paragraph 160 of the Complaint, MOB hereby repeats and incorporates by reference its responses to paragraphs 1 – 159 as if fully set forth herein.

161. In response to Paragraph 161 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

162. In response to Paragraph 162 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

163. In response to Paragraph 163 of the Complaint, MOB denies each and every allegation therein that relates to MOB. With respect to the remaining allegations set forth in this paragraph, MOB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein, and on that basis, denies said allegations.

PRAYER FOR RELIEF

In response to the bullet points under this heading in the Complaint, MOB denies each and every allegation set forth therein, and denies that Plaintiff is entitled to any alleged damages, fees, costs, or other relief against MOB.

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

TRIAL BY JURY

164. In response to Paragraph 164 of the Complaint, MOB answers and states that the allegations set forth therein are legal conclusions that are not subject to denial or admission.

AFFIRMATIVE DEFENSES

1. Plaintiff's has failed to state a claim against MOB upon which relief can be granted.

2. Damages allegedly suffered by Plaintiff were the result of the acts or omissions of third persons over whom MOB has neither control nor responsibility.

3. Plaintiff has failed to mitigate damages.

4. Plaintiff's claim for relief is barred by the doctrine of unclean hands.

5. Plaintiff's alleged damages were caused by the actions of Plaintiff and resulted from Plaintiff's own negligence.

6. Any reporting undertaken by MOB with respect to Plaintiff was accurate in all respects.

7. The reporting of post-petition delinquencies is not inaccurate or misleading under the FCRA.

8. The automatic stay imposed by section 362 of the Bankruptcy Code does not render accurate reports of delinquencies inaccurate under the terms of the FCRA.

9. Failure to comply with Metro 2 guidelines does not equate to inaccuracies.

10. Any damages suffered by Plaintiff were the direct and proximate result of conduct of Plaintiff.

11. Plaintiff's claim is barred by the statute of limitations.

12. Plaintiff reserves the right to assert additional affirmative defenses.

DATED January 4, 2016.

/s/ Joseph G. Went

Joseph G. Went, Esq.
Nicole E. Lovelock, Esq.
Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

Attorneys for Defendant
Mutual of Omaha Bank

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 4th day of January, 2016, I served a true and correct copy of the foregoing **DEFENDANT MUTUAL OF OMAHA BANK'S ANSWER TO PLAINTIFF MARGARET M. OKAMOTO'S COMPLAINT AND JURY DEMAND** by electronic transmission to the parties on electronic file and/or depositing same in the United States mail, first class postage fully prepaid to the persons and addresses listed below :

David H. Krieger, Esq.
Haines & Krieger, LLC
8985 S. Eastern Ave., Suite 350
Henderson, Nevada 89123
dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

Charles E. Gianelloni, Esq.
Snell & Wilmer LLP
3883 Howard Hughes Pkwy., suite 1100
Las Vegas, Nevada 89169
bolson@swlaw.com
cgianelloni@swlaw.com

Attorneys for Defendant Experian Information Solutions, Inc.

Matthew I. Knepper, Esq.
Akerman LLP
1160 Town Center Drive, Suite 330
Las Vegas, Nevada 89144
matthew.knepper@akerman.com

Attorneys for Defendant Bank of America, N.A.

/s/ Alexis Stajkowski

An Employee of Holland & Hart LLP